

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

FERNANDO SUZARA, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

CROWN CASTLE USA INC., a
Pennsylvania corporation,

Defendant.

Case No.: 16-cv-0551

Judge Sara L. Ellis

UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff Fernando Suzara ("Plaintiff"), pursuant to Fed. R. Civ. P. 6(b), hereby respectfully moves the Court to enter an Order continuing the current discovery deadline by forty-five (45) days. In support of the instant motion, Plaintiff states as follows:

1. On March 15, 2016, the Court entered a case schedule, ordering, among other things, that the Parties complete fact discovery by November 4, 2016. (*See* dkt. 16.)
2. After the Court set the fact discovery deadline, the Parties each propounded and responded to discovery and met and conferred on numerous issues. On October 13, 2016, Plaintiff filed an unopposed motion requesting an extension of time to complete discovery to allow time for the Parties to resolve discovery disputes without Court intervention, for Defendant to complete its supplemental production, and for the Parties to review any forthcoming documents. (*See* dkt. 23.)
3. On October 18, 2016, the Court granted Plaintiff's unopposed motion to extend the discovery deadline, extending the fact discovery deadline to January 3, 2017. (*See* dkt. 25.)
4. Since then, the Parties have continued to cooperate regarding certain discovery disputes and both have produced additional documents. Defendant has also supplemented its

production and recently produced tens of thousands of pages of documents.

5. The Parties have also scheduled two Rule 30(b)(6) depositions of Defendant's corporate representatives (one of which has been taken), a Rule 30(b)(1) deposition, and Plaintiff's deposition.

6. Given the Parties' continued and cooperative efforts to complete discovery, the voluminous supplemental document production from Defendant, the scheduled depositions, the holidays, and the upcoming January 3, 2017 fact discovery deadline in this case, Plaintiff has consulted with Defendant and requested a brief forty-five (45) day extension of the fact discovery cutoff, until February 17, 2017. Plaintiff is authorized to state that Defendant does not object to the requested extension.

7. This is the second request for an extension of the fact discovery deadline.

8. Based on the foregoing, good cause exists to grant the instant motion and the relief requested herein is not sought for any improper purpose.

WHEREFORE, Plaintiff Fernando Suzara respectfully requests that the Court enter an order (i) granting the instant motion, (ii) continuing the current fact discovery deadline to February 17, 2017, and (iii) awarding such other and further relief as the Court deems reasonable and just.

Respectfully submitted,

FERNANDO SUZARA, individually and on
behalf of all others similarly situated,

Dated: December 1, 2016

By: /s/ Sydney M. Janzen
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Sydney M. Janzen, an attorney, certify that on December 1, 2016, I served the above and foregoing by causing true and accurate copies of such paper to be filed and served on all counsel of record via the court's CM/ECF electronic filing system.

/s/ Sydney M. Janzen